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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

ANDREA OLSON, an individual

Plaintiff,

v.

UNITED STATES OF AMERICA, by
and through the Department of Energy
and Bonneville Power Administration;
and **JAMES RICHARD PERRY**,
Secretary of the Department of Energy,

Defendants.

Case No.: 3:15-cv-02216-HZ

**PLAINTIFF'S LAY WITNESS
STATEMENT**

Plaintiff will call the following witnesses:

1 Andrea Olson, Plaintiff.

Ms. Olson will testify that, in 2010, she executed a contract with Defendant Bonneville Power Administration (BPA) to provide reasonable accommodation services to BPA's employees including guidance under the Federal Rehabilitation Act and the Americans with Disabilities Act (ADA). Ms. Olson worked under the direction of Sharon Hale-Mockley, BPA's

Talent Sustainment Manager and maintained the title of Reasonable Accommodation Coordinator and used a BPA email address.

In April 2013, Ms. Olson had her first onset of anxiety while working for BPA and, in February 2014, notified BPA Management that she suffered from anxiety. She prepared an FMLA leave request in March 2014 through MBO, the contracting employer. Neither MBO nor BPA responded about her specific rights and responsibilities and entitlement to leave and she was given no notice of her rights under the FMLA.

On March 3, 2014, Ms. Olson requested reasonable accommodation and on March 25, 2014 requested leave under the FMLA. Ms. Olson was qualified for leave under the FMLA because she had worked enough hours within the requisite time and was suffering from a serious health condition.

The day after she filed an unlawful discrimination complaint for harassment with the BPA Civil Rights Equal Employment Opportunity office, BPA terminated Ms. Olson by email. She received an email from BPA notifying her that she had been terminated.

Ms. Olson wanted to return to work for BPA while on FMLA leave but her medical condition had worsened when she filed the EEOC Complaint against BPA for retaliation and harassment for filing an ethics complaint in December, 2013. She wanted to return to work but was responsible for cooperating in multiple complaint investigations and never given an opportunity to care for her medical condition. She intended to return upon the abatement of her medical condition.

Under significant and intentional deception and confusion of her identity by BPA and MBO, and because she had already been terminated, her job already given away while out on

FMLA, Ms. Olson was pressured to meet with Mr. Scott Hampton on June 5, 2014. The meeting was indicative of continued harassment by BPA personnel.

Ms. Olson was making \$95 per hour and working an average of 27.75 hours per week but was not permitted to be paid for work BPA required she perform for MBO. Ms. Olson's original BPA contract with MBO was closed by BPA without her knowledge or consent on May 14, 2012. BPA's contract with MBO for her services that she was unaware existed prior to early 2014 was through the end of January 2015.

DATED this 15th day of June, 2018.

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